

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

COMMODITY FUTURES TRADING COMMISSION,	:	X
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 01:20-cv-08132-MKV
	:	
	:	
HDR GLOBAL TRADING LIMITED,	:	Hon. Mary Kay Vyskocil
100X HOLDINGS LIMITED, ABS	:	
GLOBAL TRADING LIMITED, SHINE	:	
EFFORT INC LIMITED, HDR GLOBAL	:	
SERVICES (BERMUDA) LIMITED,	:	
ARTHUR HAYES, BEN PETER DELO,	:	
AND SAMUEL REED,	:	
	:	
Defendants.	:	
	:	
	:	

**STIPULATION AND [PROPOSED] ORDER REGARDING
SERVICE AND TIME TO RESPOND TO COMPLAINT**

Plaintiff Commodity Futures Trading Commission and defendants HDR Global Trading Limited, 100x Holdings Limited, ABS Global Trading Limited, Shine Effort Inc Limited, HDR Global Services (Bermuda) Limited, Arthur Hayes, and Samuel Reed (collectively, the “Stipulating Defendants”), by and through their undersigned counsel, and subject to this Court’s approval and to the reservation of rights contained below, agree and stipulate as follows:

WHEREAS, on October 1, 2020, plaintiff filed a Complaint (ECF No. 1) in the above-captioned action;

WHEREAS, since filing the Complaint, plaintiff has commenced efforts to seek waiver of service of the Summons and Complaint under Rule 4 of the Federal Rules of Civil Procedure; and

WHEREAS, each of the Stipulating Defendants has agreed to waive service of the Summons and Complaint, subject to all jurisdictional defenses and the terms and conditions stipulated below;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among plaintiff and the Stipulating Defendants, by and through their undersigned counsel, as follows:

1. Subject to the provisions set forth in paragraph 3 below and the reservation of rights contained in paragraph 2 below, and for purposes of this action only, the Stipulating Defendants agree to waive service of the Summons and Complaint.

2. Except as to the defense of insufficiency of service of process, no defense of the Stipulating Defendants to the claims in the above-captioned action, including without limitation defenses based upon lack of personal or subject matter jurisdiction, lack of standing, improper venue, or a Stipulating Defendant having been improperly named, is prejudiced or waived by the execution of, agreement to, or filing of this stipulation, or by the agreement to waive service of the Summons and Complaint.

3. The Stipulating Defendants will move against, answer, or otherwise respond to the Complaint by January 15, 2021, or such other later date as the Court may determine is appropriate.

Dated: October 23, 2020

Respectfully submitted,

COMMODITY FUTURES TRADING
COMMISSION

By: /s/ Joseph Platt

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Counsel for Samuel Reed

SO ORDERED

Date: _____

Hon. Mary Kay Vyskocil
United States District Judge